

EXHIBIT L

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

SECURITIES AND EXCHANGE)
COMMISSION,)

Plaintiff,)

vs.)

Case No. 4:22-cv-3359

MAURICIO CHAVEZ,)
GIORGIO BENVENUTO, and)
CRYPTOFOX, LLC,)

Defendants.)

and)

CBT GROUP, LLC,)

Relief Defendant.)
_____)

ORAL VIDEOTAPED DEPOSITION
MS. JANETTE HERNANDEZ-GONZALEZ
December 7, 2022

Reported by:
Michelle Hartman
JOB No. 221207WWC

1 A. No.

2 Q. Who was your immediate supervisor at CFX?

3 A. Gustavo.

4 Q. And this is Gustavo Gomez?

5 A. Yes.

6 Q. Okay. Who was Gustavo's immediate
7 supervisor?

8 A. I don't know.

9 Q. Did you both work for Mauricio?

10 A. Yes.

11 Q. Okay. What was -- what was Gustavo's job
12 at CFX?

13 A. He was one of the partners with Mauricio
14 and the other person, Eduardo.

15 Q. In terms of the roles they played daily
16 at CFX, what did Gustavo handle?

17 A. Presentations and anything contracts and
18 administrating the office.

19 Q. And then what roles did Mauricio handle
20 at CFX?

21 A. I don't know.

22 Q. Well, he administrated some payments
23 right, because he -- he instructed you how to make
24 payments, right?

25 A. Yes.

1 Q. Okay. So was there anything else other
2 than making payments to investors that you saw
3 Mauricio be in charge of at CFX?

4 A. He would be in charge of receiving the
5 contracts at the end of the day.

6 Q. When did you first meet Mauricio Chavez?

7 A. On October.

8 Q. October 2020?

9 A. 2020, yes.

10 Q. When you came to work for CFX and the
11 Maurizio Group?

12 A. Yes.

13 Q. How did you get the job?

14 A. Through Gustavo Gomez.

15 Q. Okay. How did you meet Gustavo?

16 A. On Facebook.

17 Q. And this was years ago, right, years
18 earlier than 2020?

19 A. Yes, before I had my son.

20 Q. Yeah. And were you dating Gustavo at the
21 time you took the job at the Maurizio Group and CFX?

22 A. Yes, I lived with him.

23 Q. Okay. What is your current relationship
24 with Mauricio Chavez?

25 A. Friends.

1 Q. When is the last time you talked to
2 Mauricio?

3 A. November 29.

4 Q. And what form was that communication in?

5 A. In person.

6 Q. What did you talk about?

7 A. Signing a document.

8 Q. Is that the affidavit that you provided
9 to us about the purchase of real estate property?

10 A. Yes, sir.

11 Q. Okay. And we'll talk about that.

12 How often do you talk to Mauricio
13 generally?

14 A. Occasionally.

15 Q. About how often is "occasionally"?

16 A. I don't really call him every day, but
17 once in a while.

18 Q. More than once a week?

19 A. Once every two weeks.

20 Q. And do you have texts with him?

21 A. Yes.

22 Q. Do you ever e-mail with him?

23 A. No.

24 Q. Do you ever communicate via WhatsApp?

25 A. Yes.

1 Q. With Mauricio?

2 A. Yes.

3 Q. And is the answer the same as to those
4 communications, it is only once every two weeks?

5 A. I don't recall exactly how often.

6 Q. Do you text or WhatsApp him more often
7 than you call him?

8 A. I talk to him more than text, when I do.

9 Q. Let's go back to the Luxury Real Estate
10 Group. Let's talk about your -- your employment
11 there. What role did you play at Luxury Real Estate
12 Group?

13 A. I would do the same as with Maurizio
14 Group, which is the market research.

15 Q. And did that stay the same -- did that
16 role stay the same the entire time you were there
17 between March and September 2022?

18 A. Yes.

19 Q. Were they the same kind of properties,
20 mainly residential?

21 A. Yes.

22 Q. And the name implies that they're fancy.
23 Were they more luxurious?

24 A. No.

25 Q. Okay. So the Luxury Real Estate Group

1 looked at the same kind of properties as the Maurizio
2 Group?

3 A. Approximately.

4 Q. Okay. And so did you also help them make
5 appointments like you did at the Maurizio Group?

6 A. Yes.

7 Q. Okay. Did you have any roles to play in
8 transactions with Luxury Real Estate Group?

9 A. No.

10 Q. And so other than helping Mauricio make
11 appointments and conducting market research, did you
12 do anything else at Luxury Real Estate Group?

13 A. No.

14 Q. Is there an office for Luxury Real Estate
15 Group?

16 A. No.

17 Q. There is no central office for that
18 business?

19 A. I don't know the office. I just know
20 that I worked from my house.

21 Q. Okay. Were you ever present for meetings
22 that Mauricio had as part of the Luxury Real Estate
23 business?

24 A. No.

25 Q. How did you present your market research

1 to Mauricio?

2 A. I will share him the website.

3 Q. And what website would you --

4 A. Websites of the properties that were
5 available.

6 Q. Okay. So these would be like Realtor
7 web --

8 A. Yes, yes.

9 Q. -- websites?

10 A. Yes.

11 Q. And your job was to find properties that
12 he might want to buy?

13 A. Yes.

14 Q. How often did he buy the property that
15 you suggested to him?

16 A. He wouldn't tell me anything about that.

17 Q. How much were you paid by Luxury Real
18 Estate?

19 A. I would receive approximately 3,500 to my
20 bank.

21 Q. Is this a week?

22 A. Twice a month.

23 Q. And did you receive any other benefits
24 from Luxury Real Estate?

25 A. No.

1 Q. So you're saying the 3,500 was a direct
2 deposit to your bank account?

3 A. Yes.

4 Q. Were there any other employees at Luxury
5 Real Estate?

6 A. Not that I know of.

7 Q. Did you negotiate this pay range with
8 Mauricio Chavez?

9 A. Yes.

10 Q. Did you ask for more money?

11 A. No.

12 Q. Who suggested the number 3,500?

13 A. Himself.

14 Q. Okay. And that was fine with you?

15 A. That was fine with me, yes.

16 Q. How many hours would you work per -- per
17 day and per -- per week for the Luxury Real Estate
18 Group?

19 A. It was from 9:00 to 5:00. So 9:00 to
20 5:00 five days a week.

21 Q. That is a pretty big pay cut from what
22 you made at the Maurizio Group; is that right?

23 A. Yes.

24 Q. Yeah. How did you -- but roughly the
25 same hours; is that right?

1 A. 9:00 to 5:00 five days a week.

2 Q. Yeah, and that's basically what you
3 worked with the Maurizio Group and CFX combined?

4 A. At CFX, it was six days a week.

5 Q. So you worked an extra day and you got
6 paid roughly twice as much?

7 A. I believe so.

8 Q. Okay. Why were you okay with that pay
9 cut?

10 A. That's what he offered, so I accepted it.

11 Q. But making half -- half as much money as
12 you were making before didn't bother you?

13 A. No.

14 Q. Did you have any other sources of income?

15 A. No.

16 Q. Other than the money that we have talked
17 about -- the 3,000 to 4,000 a week from the Maurizio
18 Group and CFX, and then later the 3,500 twice a month
19 from Luxury Real Estate -- have you received anything
20 of value from Mauricio Chavez?

21 A. When I was working with him and helping
22 him with CryptoFX, he did give me a bonus every
23 month.

24 Q. And how much would that be?

25 A. \$10,000 approximately.

1 STATE OF TEXAS

2 COUNTY OF HARRIS

3
4 REPORTER'S CERTIFICATE

5 ORAL VIDEOTAPED DEPOSITION OF

6 MS. JANETTE HERNANDEZ-GONZALEZ

7 December 7, 2022

8
9 I, Michelle Hartman, the undersigned
10 Certified Shorthand Reporter in and for the State of
11 Texas and Registered Professional Reporter, certify
12 that the facts stated in the foregoing pages are true
13 and correct.

14 I further certify that I am neither
15 attorney or counsel for, related to, nor employed by
16 any parties to the action in which this testimony is
17 taken and, further, that I am not a relative or
18 employee of any counsel employed by the parties
19 hereto or financially interested in the action.
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1 SUBSCRIBED AND SWORN TO under my hand and
2 seal of office on this 12th day of December, 2022.

3
4
5 Michelle Hartman



6 Michelle Hartman, CSR, RPR

7 Texas CSR 7093

8 Expiration: 12/31/23
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